

# **EXHIBIT F**

## **FILED UNDER SEAL**

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10  
11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

13 This Document Relates to:

14 Tucson Unified School District v. Meta  
15 Platforms Inc., et al.

16 Case No.: 4:24-cv-1382

**PLAINTIFF'S ANSWERS TO  
DEFENDANTS' INTERROGATORIES TO  
TUCSON UNIFIED SCHOOL DISTRICT  
(SET 1)**

1 PROPOUNDING PARTY: DEFENDANTS

2 RESPONDING PARTY: TUCSON UNIFIED SCHOOL DISTRICT

3 SET NO.: ONE (1)

4 DATE OF SERVICE: May 7, 2024

5 Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of this judicial  
6 district, the Tucson Unified School District ("Plaintiff"), hereby provides these answers and  
7 objections to the Defendants' Interrogatories to Tucson Unified School District (Set 1) (the  
8 "**Interrogatories**").

9 **PRELIMINARY STATEMENT**

10 Plaintiff has undertaken a reasonable effort to provide the information requested by these  
11 Interrogatories to the extent the requested information is not subject to objection, but Plaintiff has  
12 not yet received adequate or substantially complete discovery from Defendants, and Plaintiff has  
13 not completed its investigation of the facts relating to this Action. Discovery is ongoing and  
14 additional information may be obtained that may alter these responses. The following responses  
15 and objections are based upon information that has been collected and reviewed to date for the  
16 purpose of these Interrogatories and are not prepared from any personal knowledge of any single  
17 individual. Accordingly, all the following responses are given without prejudice to, and with the  
18 express reservation of, Plaintiff's right to supplement or modify its responses and objections to  
19 address additional information, and to rely upon any and all such information and documents at  
20 trial or otherwise.

21 **OBJECTIONS TO DEFINITIONS**

22 The following applies to each Interrogatory.

23 1. Plaintiff objects to Defendants' definition of "Alleged Harm" on the grounds that it  
24 calls for a legal conclusion or Expert Opinion. Further, as discovery is just beginning, and the  
25 factual record is not yet complete, additional injury and harm may need to be supplemented during  
26 fact discovery or expert discovery.

27 2. Plaintiff objects to Defendants' definition of "Relevant Time Period" as it is  
28 overbroad, calls for a legal conclusion or Expert Opinion, and is inconsistent with the relevant time

1 frame thus far established in this litigation. “Relevant Time Frame” shall mean from August 1,  
2 2017 to April 1, 2024 or the date of collection, whichever is earlier. Plaintiff reserves the right to  
3 change or modify the Relevant Time Frame based on further investigation or fact and/or expert  
4 discovery.

5 3. Plaintiff objects to Defendants’ definition of “Plaintiff,” “You,” and “Your,” as  
6 overly broad, unduly burdensome, and seeking the production of information that is not relevant to  
7 the claims or defenses of any party, not proportional to the needs of the case, and not reasonably  
8 accessible to Plaintiff upon reasonable diligence. Furthermore, the definition of these terms is over  
9 broad to the extent it would require Plaintiff to respond to these Interrogatories for people  
10 “purporting to act on its behalf” and to the extent it purports to include any of the persons identified  
11 in their personal capacities rather than as officers and employees of Plaintiff. Plaintiff objects  
12 further to this definition as seeking Privileged Information because the definition includes  
13 Plaintiff’s attorneys.

14 4. Plaintiff’s answers are made without waiving its right to object (on the grounds of  
15 relevance, hearsay, materiality, competency, or any other ground) to the use of its responses in any  
16 subsequent stage or proceeding in this action or any other action.

17 5. If Plaintiff, in response to any Interrogatory, inadvertently produced information  
18 that is or could be the subject of the objections stated herein, such production is not intended to be,  
19 nor is it deemed to be, a waiver of the objections with respect to such information provided or  
20 withheld.

## 21 **RESPONSES TO INTERROGATORIES**

### 22 **INTERROGATORY NO. 1:**

23 Identify every Person likely to have discoverable information related to Plaintiff’s claims,  
24 including Persons (a) likely to have personal knowledge that supports or contradicts a position or  
25 claim that You have taken or intend to take in this Action, or (b) upon whom You intend to rely in  
26 proving Your claims, and for each such Person, and for each such Person, describe that personal  
27 knowledge.  
28

**RESPONSE:**

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it purports to require Plaintiff to identify “every Person” whether employed by Plaintiff or third parties, or any other Person who may have any knowledge concerning the claims in the action. Plaintiff objects further to this Interrogatory to the extent it calls for the mental impressions of counsel, the identity of non-testifying experts, the premature disclosure of the identity of testifying experts, or otherwise seeks information protected from disclosure by the attorney-client privilege or work product doctrine. Plaintiff will make appropriate expert disclosures pursuant to deadlines set by the Court and in accordance with the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Plaintiff states, based on the information currently available to it, that the following persons currently or formerly employed by Plaintiff may have unique, material knowledge of Plaintiff’s allegations in this action and can be contacted through Plaintiff’s counsel:

<b>Last Name</b>	<b>First</b>	<b>Job Title</b>	<b>Subject Matter</b>
Aguayo	Vanessa	Program Coordinator	Impact of students’ use of social media on school property and impact on district operations, including addressing student mental health needs and student engagement.
Alvarez	Mark	Assistant Superintendent	Impact of students’ use of social media on school operations, including discipline and student engagement.
Armenta	Frank	Assistant Superintendent	Impact of students’ use of social media on school operations, including discipline and student engagement.
Begay-James	Roxanne	Director, Native American Student Services	Impact of students’ use of social media on school operations, including discipline and student and family engagement for Native American Students.

1	Brown	Kinasha	Assistant Superintendent	Impact of students' use of social media on school and district operations, including discipline, student mental health needs and student and family engagement.
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3				
4	Carrier	Rebecca	Program Coordinator	Impact of students' use of social media on school and district operations, including addressing student mental health needs and student engagement.
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7	Coleman	Jeffrey	Director, School Safety	Student discipline incidents and disruptive student behavior.
8	Escamilla	Karla	Director, Communications & Media Relations	Issues impacting the district, including stakeholder concerns.
9				
10	Federico Brummer	Maria	Director, Mexican American Student Services	Impact of students' use of social media on school operations, including discipline and student and family engagement for Latino Students.
11				
12				
13	Gaw	Dr. Joseph	Director, Health Services	Impact of student use of social media in schools, including mental and physical health needs.
14				
15	Grijalva	Lacey	Director, Family and Community Outreach	Student and family engagement.
16				
17	Hallums	Joseph	Director, School Safety	Student discipline incidents and disruptive student behavior.
18	Hamadeh	Rabih	Exec. Director, Technology Services	Impact of student use of social media on school and district technology systems, including bandwidth needs and efforts to safeguard students.
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20				
21	Hammel	Holly	Assistant Superintendent	Knowledge of students' use of social media on school operations, including discipline and student engagement.
22				
23	Hernandez	Ricardo	Chief Financial Officer	Financial impact of students' use of social media in schools; district budget.
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25	Huitt	Dr. Flori	Assistant Superintendent	Impact of students' use of social media on school and district operations, including student engagement and impact on curriculum.
26				
27				
28	Kerfoot	Diana	Director, Purchasing	District finances and purchasing.
	Lambert	Brian	Assistant Superintendent	Impact of students' use of social

			media on school operations, including discipline and student engagement.
Lansa	Jonathan	Director, Title I	Use of grant monies to meet student social-emotional needs.
Lowery	Nicole	Risk Manager	Incidents in the district involving property damage.
Meier	Gregory	Director, Facilities Management	Damage to district property.
Osiago	Susan	Director, Asian Pacific American Refugee Student Services	Impact of students' use of social media on school operations, including discipline and student and family engagement for APARS Students.
Rodriguez	Shawna	Assistant Superintendent	Impact of student social media use on district operations, including disruptive student behavior.
Rose	Ernest	Assistant Superintendent	Impact of students' use of social media on school operations, including discipline and disruptive behavior.
Salmon	Dr. Sabrina	Director, Exceptional Education	Impact of student social media use on district, including students with various disabilities and the impact social media has had on their learning.
Sanchez	Richard	Assistant Superintendent	Impact of students' use of social media on school operations, including discipline and student engagement.
Schwartz-Warmbrand	Anna	Director, Student Relations	Impact of students' use of social media on school operations, including student support.
Shivanonda	Julie	Director, Social Emotional Learning	Impact of students' use of social media on school and district operations, including addressing student mental health needs and student support services.
Startt	Kevin	Director, Purchasing	District finances and purchasing.
Stefan	Nikki	Director, Health Services	Impact of student use of social media in schools, including mental and physical health needs.
Stephens	Tina	Director, Title I	Use of grant monies to meet student social-emotional needs.

1	Strozier	Tonya	Director, African American Student Services	Impact of students' use of social media on school operations, including discipline and student engagement and family for African-American Students.
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4	Trujillo	Dr. Gabriel	Superintendent	Impact of students' use of social media on school and district operations, including discipline and student and parent engagement.
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6				
7	Weatherless	Renee	Chief Financial Officer	Financial impact of students' use of social media in schools; district budget.
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9	Young	Blaine	Chief Operations Officer	Impact of social media use on district operational needs.

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11 **INTERROGATORY NO. 2:**

12 For each Defendant, state the years during which You claim such Defendant engaged in

13 conduct for which You seek damages, as well as the time period for any abatement or other

14 equitable relief.

15 **RESPONSE:**

16 Plaintiff objects to the Interrogatory as premature to the extent it seeks information about

17 subjects of ongoing discovery, including expert discovery. Plaintiff's investigation is ongoing,

18 Plaintiff has not received sufficient discovery from Defendants, and the factual record is

19 incomplete. Plaintiff objects to the Interrogatory to the extent it calls for expert opinion. Plaintiff

20 objects further because the Interrogatory is compound, consisting of multiple subparts relating to

21 1) years of Defendants' relevant harmful conduct for which damages are sought and 2) the time

22 period for abatement or other equitable relief.

23 Subject to and without waiving the foregoing objections, Plaintiff states, based on the

24 information currently available, that Defendants have engaged in conduct over the following time

25 frames which has led to the Plaintiff's damages and/or requires abatement or other equitable relief.

26 For the Meta Defendants, at least back to 2004. For the TikTok Defendants, at least back to 2012.

27 For the YouTube Defendants, at least back to 2005. For Defendant Snap Inc., at least back to 2011.

28 Plaintiff states further that it will make appropriate expert disclosures concerning damages and



1 abatement or other equitable relief in accordance with the deadlines set by the Court and the Federal  
2 Rules of Civil Procedure.

3  
4 **INTERROGATORY NO. 3:**

5 Separately identify and describe (including the date, location, nature and extent, and cost of  
6 repair or replacement) every instance of vandalism, property damage, or criminal action You  
7 contend occurred as a result of Online Media & communications Services.

8 **RESPONSE:**

9 Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and  
10 disproportionate to the needs of the case to the extent it purports to require Plaintiff to identify and  
11 describe every instance of vandalism, property damage, or criminal action that occurred as a result  
12 of social media regardless of whether Plaintiff intends to claim such damage as damages in this  
13 action. Plaintiff objects further to the Interrogatory as vague and ambiguous because the phrase  
14 “property damage” is subject to multiple interpretations and may call for a legal conclusion.  
15 Plaintiff objects further to the Interrogatory as premature to the extent it seeks expert opinion and  
16 because discovery is in its early stages. Plaintiff’s investigation is ongoing, Plaintiff has not  
17 received sufficient discovery from Defendants, and the factual record is incomplete. Plaintiff  
18 objects further because the Interrogatory is compound, consisting of multiple subparts relating to  
19 1) vandalism, 2) property damage, or 3) criminal action.

20 Subject to and without waiving the foregoing objections, Plaintiff states that over the last  
21 several years, Plaintiff has incurred significant damage to its property resulting from students’ use  
22 of social media. This includes damage to district bathrooms, such as soap, toilet paper, and towel  
23 dispensers damaged or stolen, sinks pulled from the wall, damaged bathroom doors, blocked  
24 bathroom drains, and damaged toilets. Outside of the bathroom, the property damage incurred by  
25 Plaintiff resulting from students’ use of social media includes damage to fire extinguishers, school  
26 signs, drinking fountains, locker rooms, lighting, classroom tables and desks, and an outdoor stage.  
27 These and related issues involving student social media use have forced Plaintiff to lock bathrooms  
28 during certain times of the day. In addition to significant human resources needed to address these

1 harms, Plaintiff currently estimates it has spent several thousand dollars addressing these incidents  
 2 of damage to Plaintiff's physical property. In addition, these incidents prevent Plaintiff from full  
 3 use and enjoyment of its property. Plaintiff will supplement as discovery proceeds and anticipates  
 4 that further information will be produced in response to Defendants' requests for production,  
 5 including Set 1.

6  
 7 Dated: June 6, 2024

**WAGSTAFF & CARTMELL LLP**

8 /s/ Thomas P. Cartmell

9 Thomas P. Cartmell

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28 ***Counsel for Plaintiff***

**VERIFICATION**

I, Robert Ross, declare:

I am the General Counsel for the Tucson Unified School District. I am authorized to make this verification on behalf of the Tucson Unified School District. The foregoing Plaintiff's Answers to Defendants' Interrogatories to Tucson Unified School District (Set 1) represents a corporate response, based on information, in part, assembled by the Plaintiff's employees and/or representatives. Because the matters stated in the document identified above constitute a corporate response, they are not all necessarily within my personal knowledge, or within the personal knowledge of any single individual. Subject to these limitations, the information contained in the foregoing response is, to the best of Plaintiff's knowledge, true and correct. Plaintiff reserves the right to make any changes should it appear that any omissions or errors have been made.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 6, 2024

By: 